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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 LARTERESTA LYON, an individual;

12 Plaintiff,

13 vs.
14

15 NEVADA GOLD MINES, LLC, a foreign Limited-
16 Liability Company; DOES I-X; ROE BUSINESS
ENTITIES I-X,

17 Defendants.
18

Case No.: 3:21-cv-00501-LRH-WGC

19 **STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

20 **SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)**

21 **SPECIAL REVIEW REQUESTED**

22 Pursuant to Federal Rules of Civil Procedure 26(f), Defendant Nevada Gold Mines LLC
23 (“Defendant” or “NGM”) and Plaintiff Larteresta Lyon (“Plaintiff” or “Lyon”), by and through
24 their respective undersigned counsel, hereby submit the following proposed Discovery Plan and
25 Scheduling Order.

26 **A. Special Scheduling Review Requested**

27 Because the Parties are seeking deadlines that deviate from those set forth in LR 26-
28 1(b), special review is requested. Specifically, the Parties request that the relevant deadlines be
calculated from the date of the Parties Initial 26(f) Conference, rather than its first appearance. By
way of background, Plaintiff initiated this case in the Eighth Judicial District Court for the District

of Nevada, County of Clark, asserting claims for violation of the Americans with Disabilities Act, and retaliation.

B. Information Required by FRCP 26(f)

1. Counsel for the Parties conducted a meeting pursuant to FRCP 26 and LR II 26-1(a) on December 16, 2021. The Parties have agreed they will serve initial disclosures on or before **January 13, 2021**. No changes need to be made in the timing, form or requirements for such disclosures.

2. Discovery Cut Off Date. The parties request a discovery period of one hundred eighty days (180) from the Parties Initial 26(f) Conference. Therefore, the Parties request that the discovery period close on **Tuesday, June 14, 2022**.

3. Amending the Pleadings and Adding Parties. The date for filings motions to amend the pleadings or to add parties shall not be later than ninety (90) days prior to the close of discovery: **Wednesday, March 16, 2022**.

4. Expert Witness Disclosures. The disclosure of any witnesses shall be made sixty (60) days before the discovery deadline: **Friday, April 15, 2022**. Rebuttal Disclosure: **5/16/22**

5. Dispositive Motions. Dispositive motions shall be filed not later than thirty (30) days after the discovery cut-off date: **Thursday, July 14, 2022**.

6. Pretrial Order. The Joint Pretrial Order shall be filed not later than thirty (30) days after the date set for filing dispositive motions: **Monday, August 15, 2022**.¹

7. Rule 26(a)(3) Disclosures. The disclosures required by Rule 26(a)(2) and any objection thereto shall be included in the Pretrial Order.

8. Additional Deadlines. Extensions or modifications of the discovery plan and scheduling order. In accordance with LR II 26-4, a stipulation or modification or extension of this discovery plan and scheduling order must be made no later than twenty-one (21) days prior to the discovery cut-off date, and therefore, not later than **Tuesday, May 24, 2022**.

¹ August 13, 2022 is a Saturday.

DATED this 29th day of December, 2021. DATED this 29th day of December, 2021.

GABROY LAW OFFICES

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IT IS SO ORDERED:

Dated: January 3, 2022

William G. Cobb

UNITED STATES MAGISTRATE JUDGE

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